

### **REMARKS**

Reconsideration and allowance of this Application are respectfully requested in light of the foregoing amendments to the claims and the following remarks.

At the outset, Examiner Saddiqi and Supervisory Patent Examiner El-Hady are thanked for the courtesies extended to Al Blanchette of assignee e-PLUS, Inc., and Applicant's undersigned attorney during the interview of December 6, 2005.

At the interview, no agreement was reached, but the differences between the claimed invention and the Eintracht reference were discussed in detail. The Examiner requested that the claims be clarified in order to advance prosecution of the application.

Claims 1-14 and 16-66 are pending herein; claims 59-66 have been added, support for which is found primarily in originally-filed claims 1 and 23. In addition, support is found at least in the specification at page 14, lines 13-14, page 18, and lines 20-25. Applicants have amended the claims in order to clarify the recited features. For example, base claim 1 recites that the base document has a document identifier that identifies a location of the content of the document, and that when the base document is annotated by a client originator, the base document has embedded therein the annotation and rendering instructions, both for execution by a server and for display of the collaborative content by at least one receiver client workstation. Also, the transmitting step in claim 1 and the recited transmitting feature in claim have been removed and are now recited as respective dependent claims 59 and 64. The transmission of collaborative content to another workstation, while desirable, is not required. The present claimed invention provides for collaboration of a document between at least one user device, and possible several user devices with minimal requirements, often just, for example, a browser capability.

#### **Traversal of the Rejections**

##### **I. Claims 1-58 Rejected under 35 U.S. §102(e) in view of Eintracht et al.**

Claims 1-58 stand rejected under 35 U.S.C. §102(e) in view of Eintracht et al. (U.S. 6,687,878, hereafter "Eintracht"). Applicants respectfully traverse this ground of rejection.

(A) Eintracht fails to disclose or suggest the generating step as recited in Claim 1

Eintracht discloses a system for collaborative document annotation whereby notes (i.e. annotations) associated with a document are stored in a notes database on a central notes server. In Eintracht, it is disclosed that the notes are separate from the document. For example, Fig. 7 of Eintracht shows that document is first requested (step 140), and after the loading of a plug-in and image display (step 142) the document notes are requested (step 144), wherein a note buffer is first prepared and then the notes are sent (step 146) and displayed by user (see also Eintracht at column 14, line 48 to column 15, line 23).

Thus, Eintracht discloses that the notes are clearly separate from the underlying text, and the user requires a notes buffer, which is transmitted to the client. The client then updates a local notes database (Eintracht, column 14, line 63 to column 15, line 5). Accordingly, the system disclosed by Eintracht requires a powerful device with sufficient memory to store a local notes database. The client then receives all the notes for a particular document and updates the database with the information received.

**Moreover, Eintracht discloses at column 15, lines 54-58 that "[T]he structure of the local note client database is similar to that of the server note database with the except that no authentication checks are performed on the client. Thus, for example, the note database on the client does not contain a Note Owner password field."** Eintracht is disclosing that the client executes the changes to the document, including updating of a local notes database (please see Fig. 9 of Eintracht).

During the interview, the Examiner suggested that Eintracht discloses the claimed invention because at column 2, lines 16-25, Eintracht discloses that the invention can be implemented as software, a portion of which executes on the server side and a portion that executes on the client side. However, it should be noted that Eintracht goes on to state that the client software provides the tools necessary to update and store a notes database (please see, for example, Eintracht at column 2, lines 34-39, also please see column 14, lines 14-22). It is in this context that Eintracht makes the disclosure at column 2 (and repeats it at column 6).

In contrast to Eintracht disclosure at column 2, the presently claimed invention does not recite require operation of a local notes database at the client side. One

advantage of the claimed invention over the system disclosed by Eintracht is that Eintracht's system could not be operative in many small client workstations such as cell phones, PDAs, Internet appliances, pagers, and pocket pc's, the presently invention discloses at paragraph [0066] that the invention is suitable for cell phones, PDAs, Internet appliances, pagers, and pocket pc's, and specifically claims this feature (see, for example, present claim 31). Typically, if the document is HTML-based or Java scripted, in the present invention the client can annotate the drawings with only a browser and a graphical collaboration tool, and does not require a notes database that must be updated when a new document is viewed.

Moreover, in contrast with Eintracht, claim 1 of the present invention, for example, recites that a method of network collaboration includes the steps of generating by an originator client workstation a collaborative content including a base document and at least one collaborative content element that comprises at least one annotation therein and rendering instructions therefore. In addition, Claim 1 recites that there is a document identifier that identifies a location of a content of said base document, and the collaborative content is embedded (into the document identifier) as an encoded representation of collaborative content.

In contrast, Eintracht discloses that the notes are separate from the underlying document, and fails to disclose or suggest embedding annotations and rendering instructions in a document identifier, as in the present claims.

Furthermore, in the presently claimed invention, at least one of the originator client workstation and a receiver workstation receives the document identifier (typically but not limited to a URL, HTML or XML type message) and the annotations embedded in the document identifier. For example, the specification at page 19, first paragraph, discloses the case of the document identifier as a URL, with the collaborative element embedded therein. Fig. 5 also shows the document identifier (part 1), the collaborative element (part 2) and the two parts combined. Fig. 6 is a screen shot of the collaborative element (the circle) which is embedded in the document identifier of the base document in Fig. 5.

One advantage of the claimed invention is that the embedding of the collaborative content and the rendering instructions to the base document is that a database is not

necessarily required by either the server or the clients, as the annotations and the instructions are embedded as a document identifier, in the form of, for example, a URL. It is possible that a device with access to a processor could execute the annotations and instructions so that the document, and some or all of the collaborative content, could be displayed, printed, sent to another user electronically, etc. Eintracht completely fails to disclose or suggest the claimed features or any of the advantages thereof.

Applicant notes that claims 17, 34, 41 and 53 recite, respectively, a network collaboration tool, a system for network collaboration, a client system for network collaboration, and a server system for network collaboration, all of which recite a generation of collaborative content including a base document with at least one annotation and rendering instructions embedded therein, and such generation is not disclosed or suggest by Eintracht.

*(B) Eintracht also fails to disclose or suggest the rendering step in Claim 1 and the rendering of annotations and embedded instructions as in Claims 17, 23, 41 and 53*

In claim 1 of the present invention, it is recited that the rendering step is performed by the server.

At the cited location of Col. 2, lines 9-67 Eintracht teaches “At the client side, the client application layers the annotations over the image (or document)...”, i.e., that it is the client that performs the rendering step. Further, at the cited location Col. 7, lines 24-44 Eintracht teaches a web browser 42 shown in Fig. 3 at a NOTES CLIENT and not at a web server 48. Eintracht further discloses that, for example, a Note Plug-In component 44 is the tool used for browsing the documents located on the server side (Col. 7, line 34) and it is invoked each time the browser gets a response from the Web Server 54 (Col. 7, lines 35-36) and that the communication protocol between Notes Clients and Notes server is standard HTTP “...The web browsers 42 and the Notes Server 58 communicate with the web server 54 via the HTTP protocol” (Col. 7, lines 37-44). Finally, Applicants point out that at least at Fig. 7 Eintracht teaches that it is the client that renders the document and notes (the combined collaborative content) and **not** the server.

With regard to base claims 17, 23, 41 and 53, Eintracht also fails to disclose or suggest the rendering of base document with annotations and instructions embedded therein.

(C) Eintracht fails to disclose the embedding of the annotations and rendering instructions to the document identifier as in Claims 1, 17, 23, 41 and 53

Eintracht discloses that the location of an annotation is called a Note Anchor and is kept separate from the annotated data (column 7, lines 60-63). Once a note is created, its anchor point can be changed by the user.

Furthermore, while the presently claimed invention recites an embedding of the annotation and rendering instructions in the document identifier, Eintracht does not embed the annotation and rendering instructions in a document identifier as presently claimed. In fact, Eintracht merely discloses identifying the notes by, for example, by number (please see Fig. 12 of Eintracht, notes 250, 252), and it should be noted that Fig. 10 shows the client annotation event data structure as well, which is a response buffer in which the notes are stored (column 16, lines 51-52).

Finally, it should be noted that Eintracht discloses in the Abstract that "the documents and associated annotations are treated independently from each other whereby separate data structures are created for the documents and for the associated annotations."

Thus, it cannot be said that Eintracht discloses the recitation of present claim 1, or that of base claims 17, 23, 41 and 53, with regard to embedding. For example, in Claim 17, the collaborative element generated by the graphical collaboration tool is not disclosed. With regard to claim 23, Eintracht fails at least to disclose a system wherein a processor executes a document having annotations and instructions embedded in the document identifier. With regard to claim 41, Eintracht fails at least to disclose a graphical collaboration tool downloaded from a server for generating collaborative content and rendering instructions, wherein the collaborative content having an annotation and rendering instructions for execution is embedded in the document identifier. With regard to claim 53, Eintracht also fails at least to disclose a server process as claimed.

For at least the reasons discussed in sections (A) through (C), Applicants respectfully submit that it is clear that none of the present claims are anticipated by Eintracht. In addition, Applicants respectfully submit that none of the present claims would have been obvious to a person of ordinary skill in the art at the time of invention in view of Eintracht.

Applicants also respectfully submit that the dependent claims have a separate basis for patentability, and reaffirm the reasons in support thereof that were expressed by the Applicants in the Office Action filed April 2005.

Reconsideration and withdrawal of the rejection under 35 U.S.C. §102(e) are respectfully requested.

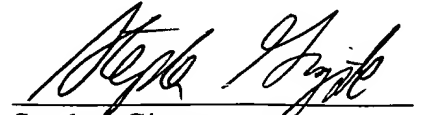
Moreover, Applicants respectfully submit that new 59-66 are also allowable for the reasons discussed above and because of a separate basis for patentability.

### **CONCLUSION**

In view of the foregoing remarks and analysis, it is respectfully submitted that all rejections stated in the Office Action have been overcome. A Notice of Allowance is respectfully requested.

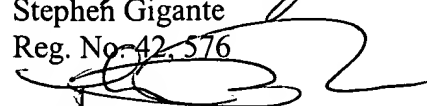
In the event that the Examiner believes that it may facilitate the advancement of this application, the Examiner is invited to contact the undersigned attorney at the local Washington, D.C. telephone number indicated below.

Respectfully submitted,



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